

## REMARKS

By this amendment, Claims 1, 4–6, 9–11, 14–16, and 19 are amended. No claims are added or canceled. Claims 1–20 are now pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application.

Each issue raised in the Office Action mailed October 9, 2008, is addressed hereinafter.

### I. ISSUES RELATING TO CLAIM AMENDMENTS

Support for the amendments made to the claims can be found in the at least the following paragraphs of the Specification.

#### Paragraph [0028]:

Alternatively, MDA schema definition files 124 may be generated, at least in part, based upon CLI definition files (.cmd files). CLI definition files are text files that define, for each component supported by router 102, the configuration command syntax, configuration command options and mappings of configuration commands to management data stored on router 102.

#### Paragraph [0035]:

XML schema compiler 136 processes XML schemas 130 and developer-edited map file 140 and generates a resource file 142. Resource file 142 is an XML file that contains a complete set of properties and corresponding attribute values for each component supported by router 102.

#### Paragraph [0040]:

SER/DES module 112 examines parameters contained in the validated request and requests XML tag information from metadata manager 120 for each parameter. XML tag information is requested by Component Name, Record Name and Property Name, depending upon the parameter. For example, suppose that the request from client application 118 requests all configuration data for the component named RSVP. SER/DES module 112 requests from metadata manager 120, the XML tag information for the component RSVP. SER/DES module 112 then generates an XML

request for the configuration information for the component using the XML tag information provided by metadata manager 120.

## II. ISSUES NOT RELATING TO ANY CITED ART

The Examiner is hereby notified that the present application is related to the following related application: U.S. Patent Application No. 10/727,153, filed on December 2, 2003, Attorney Docket No. 50325-0858. The Examiner is hereby notified that an Office Action was mailed in the related application on September 3, 2008.

The related application may contain subject matter that is related to the subject matter of the present application. The related application may contain one or more claims that may be substantially similar to one or more claims in the present application, and those claims may have been rejected in the related application. Therefore, the Examiner is encouraged to review the file history of the related application as some of the information contained therein may be material to the examination of the present application.

## III. ISSUES RELATING TO CITED PRIOR ART: CLAIMS 1–20—SHAFER IN VIEW OF SWEDOR IN VIEW OF PECINA

Claims 1–20 are rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent No. 7,072,946, issued to Shafer, in view of U.S. Patent No. 7,313,608, issued to Swedor, in further view of U.S. Patent No. 7,130,870, issued to Pecina. Based on the following arguments, the rejections are respectfully traversed.

Independent Claim 1 recites:

generating, at a client element by a first client application, **an XML file that includes XML tag information that corresponds to attribute values for each property of a plurality of properties for one or more components that are supported by the router**, wherein the XML file is **generated based in part on command line interface**

**(CLI) definition files corresponding to each of the one or more components;**

receiving, at the client element from a second client application, a request that conforms to a table-based data model to perform an operation on management data maintained by the router,

wherein the client application is not XML-aware, and

wherein parameters of the request are expressed in name/value pairs;

examining the parameters of the request;

**retrieving the XML tag information that corresponds to each of the parameters from the XML file;**

generating, by the client element, an XML request based on the parameters of the request from the client application that is not XML-aware,

**wherein the XML request is generated using the XML tag information;**

....

(emphases added.) No combination of Shafer, Swedor, and Pecina provide at least the bold-faced features of Claim 1 shown above. For at least this reason, it is respectfully submitted that Claim 1 is patentable over Shafer, Swedor, and Pecina.

Claim 1 recites, “generating ... an XML file that includes XML tag information that corresponds to attribute values for each property of a plurality of properties for one or more components that are supported by the router ... based in part on command line interface (CLI) definition files corresponding to each of the one or more components.” No combination of the cited art teaches this feature. For example, Shafer describes a router that invokes an XML API upon receiving a **CLI command to invoke the XML API** at a router. The only CLI command described in Shafer is ““xml-mode” command (40)” that invokes the XML API. Thus, the CLI login stream is transformed into an interface that accepts XML. (Shafer, Col. 5: line 65 – Col. 6: line 10.) Because the router interface is being transformed from CLI to XML, no **XML files** are generated in this *interface transformation* operation, as described in Shafer.

Shafer also describes the router accepting configuration requests and operational requests encoded with XML tags from a client. Shafer merely describes that the XML tags are encoded by router clients, which take the form of human system administrators or automated scripts, **based on DTD files or XML Schema files.** (Shafer, Col. 2: lines 15–17, “Based on data type definition (DTD) files or XML Schema language files, clients, such as human users or automated scripts, can encode the requests with XML tags.”; Shafer, Col. 5: lines 47–48, “Router clients encode configuration requests and operational requests with extensible markup language tags.”; Shafer, Col. 8: lines 63–65, “In operation, management server module 32 receives both configuration requests and operational requests encoded with XML tags from clients 56, 58, 60.”; Shafer, Col. 8: lines 49–51, “CLI client 56 may take the form of a remote computer operated **by a human user** who enters CLI commands encoded with XML tags that conform to the API.”;)

Because Shafer describes that the XML input is **encoded by a human user**, or is **based on DTD files or XML Schema files**, Shafer does not teach or describe generating the XML file “based in part on command line interface (CLI) definition files corresponding to each of the one or more components,” as recited in Claim 1.

Neither Swedor nor Pecina “fill the gaps” left behind by Shafer with respect to Claim 1. Swedor describes a client that creates an XML request to access or to configure the network device. The XML request is sent to a network device for decoding. (Swedor, Col. 4: lines 4 – 21.) However, because Swedor **does not describe how said XML request is encoded at the client**, Swedor does not teach “generating, at a client element by a first client application, an XML file that includes XML tag information that corresponds to attribute values for each property of a plurality of properties for one or more components that are supported by the router,

wherein the XML file is generated based in part on command line interface (CLI) definition files corresponding to each of the one or more components;” and “generating, by the client element, an XML request based on the parameters of the request from the client application that is not XML-aware, wherein the XML request is generated using the XML tag information;” as recited in Claim 1.

Pecina also fails to fill the gaps left behind by Shafer and Swedor with respect to Claim 1. Pecina, in FIG. 3I, illustrates the command prompt commands that are available for changing device configuration from a console interface. However, because Pecina does not teach any XML, nor generating any XML files based on any command line interface (CLI) definition files, Pecina does not teach one or more express features of Claim 1.

Based on the foregoing, because no combination of Shafer, Swedor and Pecina teaches or discloses each and every express feature as recited in Claim 1, it is respectfully submitted that Claim 1 is patentable over Shafer, in view of Swedor, in further view of Pecina.

Independent Claims 4–6, 9–11, 14–16, and 19–20 each include some form of the elements “generating, at a client element by a first client application, an XML file that includes XML tag information that corresponds to attribute values for each property of a plurality of properties for one or more components that are supported by the router, wherein the XML file is generated based in part on command line interface (CLI) definition files corresponding to each of the one or more components;” and “generating, by the client element, an XML request based on the parameters of the request from the client application that is not XML-aware, wherein the XML request is generated using the XML tag information;” as recited in Claim 1. It is respectfully submitted that Claims 4–6, 9–11, 14–16, and 19–20 are patentable over Shafer, in view of Swedor, in further view of Pecina for at least the reasons given with respect to Claim 1.

In addition, each of Claims 4–6, 9–11, 14–16, and 19–20 introduces one or more additional features that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claims 4–6, 9–11, 14–16, and 19–20 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the independent claims. It is therefore respectfully submitted that Claims 4–6, 9–11, 14–16, and 19–20 are patentable over Shafer, in view of Swedor, in further view of Pecina for at least the reasons given above with respect to Claim 1.

Claims 2, 3, 8, 12, 13, 17, and 18 are dependent claims, each of which depends (directly or indirectly) on Claims 1, 6, 11, and 16. Each of Claims 2, 3, 8, 12, 13, 17, and 18 is therefore allowable for at least the reasons given above with respect to Claims 1, 6, 11, and 16. In addition, each of Claims 2, 3, 8, 12, 13, 17, and 18 introduces one or more additional features that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claims 2, 3, 8, 12, 13, 17, and 18 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

### **CONCLUSION**

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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